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Attorneys for Plaintiff TINA LAMBERT

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TINA LAMBERT,

Plaintiff,

v.

WYNN LAS VEGAS, LLC, a Nevada Limited  
Liability Company; DOES I-X; ROE  
BUSINESS ENTITIES I-X,

Defendant.

Case No. 2:25-cv- 00513-APG-BNW

**STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER**

**(SUBMITTED IN COMPLIANCE WITH  
LR 26-1(b))**

Defendant, WYNN LAS VEGAS, LLC (hereinafter “Wynn”), and Plaintiff, Tina Lambert (“Lambert”), by and through their respective attorneys of record, hereby submit this Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(b).

**1. Fed. R. Civ. P. 26(a) Initial Disclosures:**

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Court 26-1(a), on April 16, 2025, counsel for Plaintiff, JP Kemp, Esq. and Ruthann Devereaux-Gonzalez, Esq., and counsel for Defendant, Cayla Witty, Esq. of Jackson Lewis, conducted a meeting to discuss the relevant

1 issues for discovery, possible early resolution of the matter, and other pertinent issues. Pursuant to  
2 these discussions, the parties agree that they will submit their initial disclosures on or before **April**  
3 **30, 2025**.

4  
5 **2. Discovery Cut-Off Date:**

6 The parties request a discovery period of 180 days from March 26, 2025, the date Defendant  
7 Wynn filed its Answer. Accordingly, all discovery must be completed no later than **Monday,**  
8 **September 22, 2025**.

9  
10 **3. Amending the Pleadings and Adding Parties:**

11 The date for filing motions to amend the pleadings or to add parties shall not be later than  
12 ninety (90) days prior to the discovery cut-off date and, therefore, not later than **Tuesday, June 24,**  
13 **2025**.

14  
15 **4. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):**

16 In accordance with Rule 26(a)(2), initial disclosures identifying experts shall be made sixty  
17 (60) days prior to the discovery cut-off date, and therefore, not later than **Thursday, July 24, 2025,**  
18 and disclosures identifying rebuttal experts shall be made thirty (30) days after the initial disclosure  
19 of experts and, therefore, not later than **Monday, August 25, 2025**.

20  
21 **5. Dispositive Motions:**

22 The parties shall file dispositive motions not more than (30) days after the discovery cut-  
23 off date and, therefore, not later than **Wednesday, October 22, 2025**.

24  
25 **6. Pretrial Order:**

26 If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint  
27 Pretrial Order shall be filed not more than thirty (30) days after the date set for filing dispositive  
28 motions and, therefore, not later than **Friday, November 21, 2025**.

1           **7. Fed. R. Civ. P. 26(a)(3) Disclosures:**

2           If no dispositive motions are filed, and unless otherwise ordered by this Court, the parties  
3 shall file the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto with the  
4 Pretrial Order pursuant to LR 26-1(b)(6) in the Joint Pretrial Order, not more than thirty (30) days  
5 after the date set for filing dispositive motions and, therefore, not later than **Friday, November 21,**  
6 **2025.**

7  
8           **8. Alternative Dispute Resolution:**

9           The parties certify they have met and conferred about the possibility of using alternative  
10 dispute-resolution processes including mediation, arbitration and early neutral evaluation. This  
11 case is currently set for an Early Neutral Evaluation session before Magistrate Judge Daniel J.  
12 Albregts, to take place on May 28, 2025 and the parties are prepared to attend and negotiate in good  
13 faith.

14  
15           **9. Alternative Forms of Case Disposition:**

16           The parties certify they have considered consent to trial by a magistrate judge under 28  
17 U.S.C. § 636(c) and Fed.R.Civ.P.73 and the use of the Short Trial Program (General Order 2013-  
18 01).

19  
20           **10. Electronic Evidence:**

21           The parties certify they have discussed whether they intend to present evidence in electronic  
22 format to jurors for the purposes of jury deliberations. Discussions between the parties will be  
23 ongoing as the trial date approaches and they stipulate that they intend to present any electronic  
24 evidence in a format compatible with the court's electronic jury evidence display system.

25  
26           **11. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

27           In accordance with Local Rule 26-3, a stipulation or motion for modification or extension  
28 of this discovery plan and scheduling order must be made no later than twenty (21) days before the

1 expiration of the subject deadline.

2  
3 Dated: April 22, 2025

Dated: April 22, 2025

4 Respectfully submitted,

Respectfully submitted,

5  
6 /s/ Ruthann Devereaux-Gonzalez

JAMES P. KEMP, ESQ.

7 KEMP & KEMP, ATTORNEYS AT LAW

8 LEON GREENBERG, ESQ.

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11 Attorneys for Plaintiff

12 TINA LAMBERT

/s/ Cayla Witty

DEVERIE J. CHRISTENSEN, ESQ.

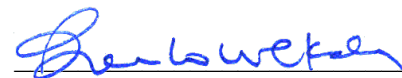
CAYLA J. WITTY, ESQ.

JACKSON LEWIS P.C.

Attorneys for Defendant  
WYNN LAS VEGAS, LLC.

13  
14 **IT IS SO ORDERED.**

15 Dated: April 25, 2025.

16 

17 UNITED STATES MAGISTRATE JUDGE